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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

ALEXANDRA RASEY-SMITH, et al.,

Plaintiffs,

vs.

CITY OF LOS ANGELES, et al.,

Defendants.

Case No. 1:23-CV-01569-JLT-BAM

[Hon. Michelle Williams Court]

**DECLARATION OF ERIC
VALENZUELA IN SUPPORT OF
PLAINTIFFS' MOTION FOR
LEAVE TO FILE EXHIBITS
UNDER SEAL IN SUPPORT OF
THEIR OPPOSITION TO
DEFENDANTS' MOTION FOR
PARTIAL SUMMARY JUDGMENT**

*[Application and Proposed Order filed
concurrently herewith]*

DECLARATION OF ERIC VALENZUELA

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2 1. I am an attorney licensed to practice law in the United States District
3 Court for the Central District of California. I am one of the attorneys of record for
4 the Plaintiffs in this action. I have personal knowledge of the matters stated herein
5 and would and could testify competently thereto if called. I make this declaration in
6 support of Plaintiffs' MOTION for LEAVE to LODGE EXHIBITS UNDER SEAL
7 in SUPPORT of THEIR OPPOSITION to DEFENDANTS' MOTION for
8 PARTIAL SUMMARY JUDGMENT.

9 2. The material previously designated as confidential is as follows:
10 **Exhibit D-** Transcript of Recorded Interview of Officer Orozco;
11 **Exhibit G-** Transcript of Recorded Interview of Officer Chomuk;
12 **Exhibit H-** Transcript of Recorded Interview of Defendant Garcia;
13 **Exhibit I-** Transcript of Recorded Interview of Sergeant Punzalan;
14 **Exhibit J-** Transcript of Recorded Interview of Officer Jauregui;
15 **Exhibit Q-** Transcript of Recorded Interview of Officer Quintero;
16 **Exhibit R-** Transcript of Recorded Interview of Officer Rodriguez; and
17 **Exhibit S-** Transcript of Second Recorded Interview of Officer
18 Rodriguez.

19 3. The Designation Parties are the Defendants the City of Los Angeles
20 ("City") and Caleb Garcia Alamilla ("Officer Garcia").

21 4. I emailed defense counsel for the City and Officer Garcia and identified
22 the specific documents I wanted to attach in support of Plaintiffs' Opposition to
23 Defendants' Motion for Summary Judgment (ECF. Doc. 51). These documents
24 included reports, various videos and transcripts of officer recorded interviews.
25 Defense counsel agreed that the report and various videos did not have to be filed
26 under seal (in part because the Court already denied Defendants' request to file the
27 videos of the incident under seal (ECF. Doc. 56)). However, Defense counsel required
28 that the transcripts of the officer involved interviews be filed under seal.

1 I declare under penalty of perjury of the laws of the United States of America
2 that the foregoing is true and correct, and that this declaration was executed this
3 23rd day of December, 2025, at Woodland Hills, California.

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5 /s/ Eric Valenzuela
6 Eric Valenzuela
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